

# SUMMARY

Prepared by Nicholle Jackson  
On Tuesday, September 20, 2005



## Volatile Organic Compounds from Processes and Consumer Products Workgroup Meeting

**Held September 7, 2005**

**Somerset County Office of Emergency Management Training Building, Hillsborough  
Township, Somerset County**

**Meeting called by: Bob Heil, Group Leader**

**Facilitator: Nicholle Jackson**

### Attendees:

| Name                  | Affiliation   |
|-----------------------|---|
| Mike Adhanom          | NJDEP – Air Permitting  |
| Leslie Bates          | NJDEP   |
| Marge Baumhauer       | Graphic Arts Association                                      |
| Ed Biedell            | Consultant  |
| Pat Brown             | Chevron   |
| Luis A. Comas         | Sunoco  |
| Michelle Donohue      | Graphic Arts Association                                      |
| Dan Forestiere        | Sherwin-Williams  |
| Barbara Francis       | American Chemistry Council                                    |
| Max Friedman          | NJDEP – Air Permitting  |
| Toby Hanna            | ERM   |
| Vicki Keenan          | Association of Graphic Communications                         |
| Marci Kinter          | SGIA  |
| Heidi McAullife       | NPCA (via speakerphone)                                       |
| Richard Moore         | Alton Env't. Services   |
| Hiram Oser            | NJDEP – Air Enforcement Program                               |
| Tim Roessler          | IMTT – Bayonne  |
| Tony Russo            | Chemistry Council New Jersey                                  |
| Gwen Schell           | Griffin Pipe Products   |
| Richard Siller        | Amarada Hess  |
| Elizabeth Stochak     | NJDEP   |
| Michael Tsakaloyannis | Clough Harbour Assoc.   |
| Christine Visnic      | Merck & Co., Inc.   |
| Joseph Yost           | Consumer Specialty Products Association<br>(via speakerphone) |
| Rosemary Zaleski      | ExxonMobil Biomedical Sciences                                |

**Materials:** Agenda, Minutes from August 9, 2005 VOC workgroup meeting, Workgroup Report Overview, Workgroup Report Timeline, USEPA Federal Register *Advance Notice to Solicit Comments, Data and Information for Determining the Emissions Achieved in Ozone Attainment and Maintenance Areas From the Implementation of Rules Limiting the VOC Content of AIM Coatings*, USEPA Interim Guidance on Control of Volatile Organic Compounds in Ozone State Implementation Plans

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## Call to Order

*Attendees Sign In*

*Review of minutes from the 8/9/05 Workgroup Meeting*

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## Discussion

### Topic 1: Overview of Report Format and Timeline for Completion

#### Discussion:

- An overview of the format for the final report format was discussed
- The schedule for report completion was distributed to the workgroup. The schedule was revised based on comments received from workgroup members
- Members of the workgroup were encouraged to submit White Papers. The White Papers will be appended to the final workgroup report
- **September 30, 2005** is the deadline for workgroup members to submit information and white papers. Please send all information to [airworkgroupvoc@dep.state.nj.us](mailto:airworkgroupvoc@dep.state.nj.us)
- **October 14, 2005:** NJDEP Workgroup Team will complete preparation of the workgroup report and share with the workgroup for edits/comments
- If necessary, there will be a conference call or meeting scheduled for the week of **October 24-28** to discuss report revisions. This will be determined by the needs of the workgroup
- **October 31, 2005:** Deadline for submission of Final workgroup reports to NJDEP Commissioner

#### Action Items/Person(s) responsible/Deadline:

1. See deadlines above

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### Topic 2: Review of Tracking Items Previously Raised

#### Discussion:

- The workgroup revisited tracking items that were proposed at previous meetings. Please see "Draft Final Workgroup Proposals" to view the comments that were added to each tracking item.

#### Overview of Tracking Items Discussed:

- **VOC-001:** NJDEP permitting staff stated that the New Jersey standard for degreasers is now equivalent to the MACT standard. The majority of the workgroup believes that degreasing industries, regardless of size, are already regulated to the maximum. Members of the workgroup suggested that outreach and enforcement alerts be increased to smaller facilities regarding the MACT standards, conducting efficient degreasing operations, and the potential use of less volatile and aqueous solvents. An additional option that was suggested is to require all degreasers to obtain a general permit, which may increase rule effectiveness. Some workgroup members stated that a general permit might not be an efficient method to track the number of degreasers that are regulated.
  - **VOC-002:** A representative of the National Paint and Coatings Association stated that the USEPA announced that it may propose a national reactivity-based regulation for aerosol coatings at the end of 2005. The rule will be based on California's rule. The representative stated that there may not be additional benefit to the State of New Jersey to accelerate a reactivity-based rule for aerosol coatings if the USEPA plans to propose a similar rule. The workgroup agreed that New Jersey will benefit from a reactivity-based regulation for aerosol coatings and should follow the progress of the possible national rulemaking.
  - **VOC-003:** A representative of the National Paint and Coatings Association stated that CA is behind on the rulemaking schedule for Cons-2. The representative stated that it may be premature for NJ to consider proposing a rule similar to Cons-2 and should wait for CA to finish its rulemaking process. Another
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workgroup member stated that although some major large companies formulate on a global basis, other smaller companies formulate on a local/regional basis.

- **VOC-004:** The workgroup made no further comments on this proposal.
- **VOC-005:** It was suggested that the workgroup contact the NJ Petroleum Council and the Fuel Merchant Association for more information pertaining to this proposal. A petroleum industry representative volunteered look into this subject further.
- **VOC-006:** The workgroup suggested that the narrative on this subject in the workgroup report include a statement that the benefits of this proposal will be difficult to quantify.
- **VOC-007:** There were no further comments on this proposal. The proposal will be included in the "Parking Lot" issues section of the workgroup report.
- **VOC-008:** After some debate among members of the workgroup, it was concluded that additional controls should be considered and all tanks should be required to meet the standards imposed on newer tanks by federal NSPS and MACT standards.
- **VOC-009:** Representatives of graphic arts trade associations stated the current SOTA requirements fulfill this proposal and that graphic arts should not be controlled further. There remains some concern on how many graphic arts operations have pre-1997 permits (SOTA creation) and the graphic arts association will attempt to help NJDEP quantify the number of potentially affected facilities. A graphic arts representative stated that the digital printing sector is not covered by SOTA requirements in New Jersey and that this may be an issue to evaluate. The graphic arts representatives suggested that a separate co-proposal be created for surface coating. Upon further evaluation, this idea was abandoned because surface coating operations are already required to have 90% capture efficiency under Sub 16.
- **VOC-010:** The workgroup made no further comments on this proposal.
- **VOC-011:** Some petroleum industry representatives expressed safety concerns with controls on refinery flares. It was suggested that each flaring incident should be recorded and analyzed. Volumetric flow rates and flare composition should be monitored and recorded. Within three years, flare recovery systems should be installed and operated.
- **VOC-012:** It was concluded that an estimated 547 TPY of VOC is emitted from many closed and small landfills and do not warrant further review. Many large or active landfills have energy recovery systems. A State of the Art policy (possibly following NSPS standards) should be considered for landfills with potential to emit greater than 10 TPY.
- **VOC-013:** This proposal will be included in the "Parking Lot" issues section of the workgroup report. The workgroup concluded that the NJDEP should consider a workgroup for reaching out to industry to help improve the inventory and that improvements should be considered for the software that is used to calculate emissions.
- **VOC-014:** The workgroup made no further comments on this proposal.
- A workgroup member distributed copies of the following to the workgroup: 1) USEPA Federal Register Advance Notice to Solicit Comments, Data and Information for Determining the Emissions Achieved in Ozone Attainment and Maintenance Areas From the Implementation of Rules Limiting the VOC Content of AIM Coatings and 2) USEPA Interim Guidance on Control of Volatile Organic Compounds in Ozone State Implementation Plans.

#### **Action Items/Person(s) responsible/Deadline:**

1. "Draft Final Workgroup Proposals" will be distributed to the workgroup. Workgroup members may comment on the proposals until September 30, 2005. After this date, the proposal tracking forms will be appended to the workgroup report with only the comments that were received on or before September 30

2. Workgroup members must submit all additional tracking items by September 30, 2005
3. NJDEP will contact the individuals that volunteered to provide additional information for the workgroup report

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## **Lunch Break**

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### **Topic 3: Review of New Tracking Forms**

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#### **Discussion:**

#### **Overview of Tracking Items Discussed:**

- **VOC-015:** Some workgroup representatives expressed safety concerns with adding additional controls to bulk storage tanks. Some workgroup representatives stated that the emissions from tank cleaning are minimal and that tank cleaning is conducted infrequently (once every 10-20 years on an API schedule). The workgroup concluded that Emissions from bulk tank cleaning should be captured and controlled. The control may be a portable thermal oxidizer or other control measures may be adopted upon further review of the issue.
- **VOC-016:** It was concluded that this VOC source should be studied to determine whether or not there are significant emissions to be controlled. A workgroup member stated that the Association of Environmental Authorities is looking into this and may submit some information or a white paper.
- **VOC-017:** The workgroup concluded that the inclusion of additional sources of leak detection and repair and the further use of imaging technology as a tool to identify fugitive leaks and potentially a tool for outreach and education is strongly suggested.
- **VOC-018:** This proposal will be included in the "Parking Lot" issues section of the workgroup report.
- A workgroup member suggested stating in the report that the NJDEP consider implementing any of the proposed control measures on a seasonal basis if it is more feasible.
- A workgroup member suggested using language to encourage companies to come up with formulations for consumer products/AIM coatings that are reactivity-based rather than mass-based.

#### **Action Items/Person(s) responsible/Deadline:**

1. All comments on these tracking items must be submitted by September 30, 2005 for inclusion in the workgroup report.

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### **Topic 4: Further Discussion of Workgroup Report**

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#### **Discussion:**

- The purpose and goals of the workgroup report were explained to the workgroup
- The workgroup decided on a method to rank the recommendations.
- The workgroup was encouraged to submit language for use in the workgroup report to explain that not every workgroup member necessarily agrees with every recommendation in the workgroup report.
- The workgroup prioritized the proposals that were discussed as of September 7, 2005.

#### **Action Items/Person(s) responsible/Deadline:**

1. NJDEP will send a copy of the prioritized proposal list to the workgroup. The workgroup may comment on the list until September 30, 2005.
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## Wrap-up

- All information/proposals/comments/White Papers must be submitted by September 30, 2005. Please submit all items to [airworkgroupvoc@dep.state.nj.us](mailto:airworkgroupvoc@dep.state.nj.us)
  - A follow-up meeting with participants from all workgroups will take place on November 14, 2005 at NJDEP headquarters in Trenton. Details will be sent at a later date.
  - An air quality update workshop is tentatively scheduled for Spring 2006
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